Walk, Roger A.

From: Walk, Roger A.
Sent: Thursday, January 30, 2003 2:40 PM
To: Osborne, Kevin (PMMC Legal); Roethig, Hans; Adams, Candace R.
Cc: McCann, Amy Arnold; Murphy, Virginia; Solana, Rick P.
Subject: Comment re: FTC "tar" descriptors

Kevin,

We went at length into a scientific approach (best possible separation) to define our 'sections' for the total US market when using FTC 'tar' numbers. We used the MA benchmarking data and the best (most accurate and recent) tar numbers (FTC method) and have explained our rationale for the choices we made for the TES to PMUSA Senior Management and the public health community. Our criteria were scientific not conventions. We also do not intend to use descriptors in the TES but describe the tar sections by their boundary numbers. So I can understand the interest in consistency I cannot recommend to redefine or change the approach taken in the TES.

I cannot comment on whether the tar categories in the surveillance plan should be revisited, because I am not familiar with the rationale used for those choices. I am sure Hans and Candace can explain/comment.

Regards,
Roger

-----Original Message-----
From: Osborne, Kevin (PMMC Legal)
Sent: Thursday, January 30, 2003 2:17 PM
To: Roethig, Hans; Walk, Roger A.; Adams, Candace R.
Cc: McCann, Amy Arnold; Murphy, Virginia
Subject: FTC "tar" descriptors

Hans, Roger and Candace

In reviewing the draft surveillance plan, I noted that the tar categories were not described according to industry and Philip Morris USA convention. I raised this with Candace yesterday and, given potential implications, wanted to raise with all of you. It's my understanding that these "tar" categories are used in the Total Exposure Study.

For your information, this convention is:

Full flavor - average per cigarette "tar" of 15 mg. or more

Lights - average per cigarette "tar" of 7 to 14 mg.

Ultra Lights - average per cigarette "tar" of 6 mg. or less.

As you know, the FTC method provides for rounding to the nearest mg. of tar, e.g., the "tar" range for Lights defined in terms of tenths of a mg. with rounding would be 6.5-14.4 mg. "tar" average per cigarette. The FTC Report published by the FTC reports "tar" in whole number, with the rounding done by TITL or the manufacturer performing the test.

I'm concerned that the use of different categories may cause internal and external confusion, especially with the FTC and public health community. I think it's fine from this perspective to create subdivisions within the conventional categories, but creating new categories which overlap with two conventional categories could be problematic and should be avoided absent a scientific reason to define differently. I think these different categories could be confusing internally and, importantly, potentially confusing in discussing the eventual results with regulators and others in the public health community.

Once you've had an opportunity to review, I suggest we discuss.

thanks